

EXHIBIT 14

FILED UNDER SEAL

Paper No. 1

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.,

Petitioner,

v.

NETLIST, INC.,

Patent Owner

Patent No. 9,318,160

Issued: April 19, 2016

Filed: July 21, 2014

Inventor: Hyun Lee

Title: Memory Package with Optimized Driver Load and Method of Operation

Inter Partes Review No. IPR2022-01427

**PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 9,318,160**

Petition for *Inter Partes* Review of U.S. Patent No. 9,318,160

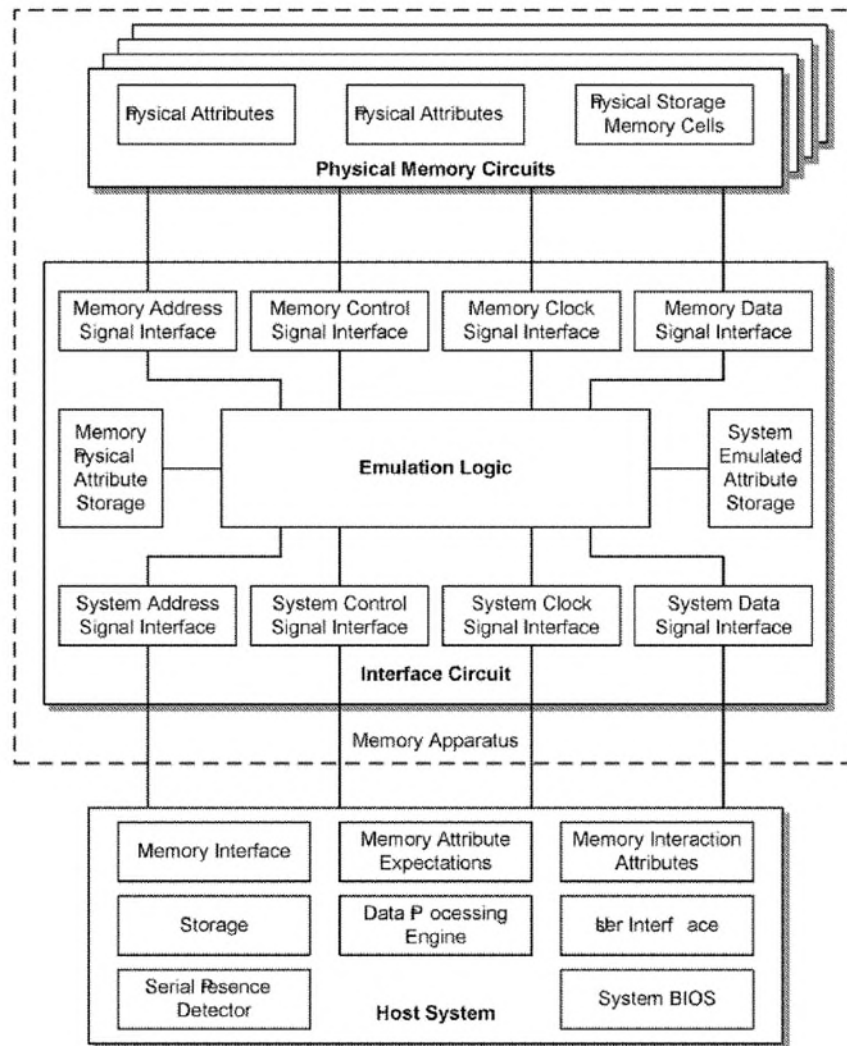


FIG. 18

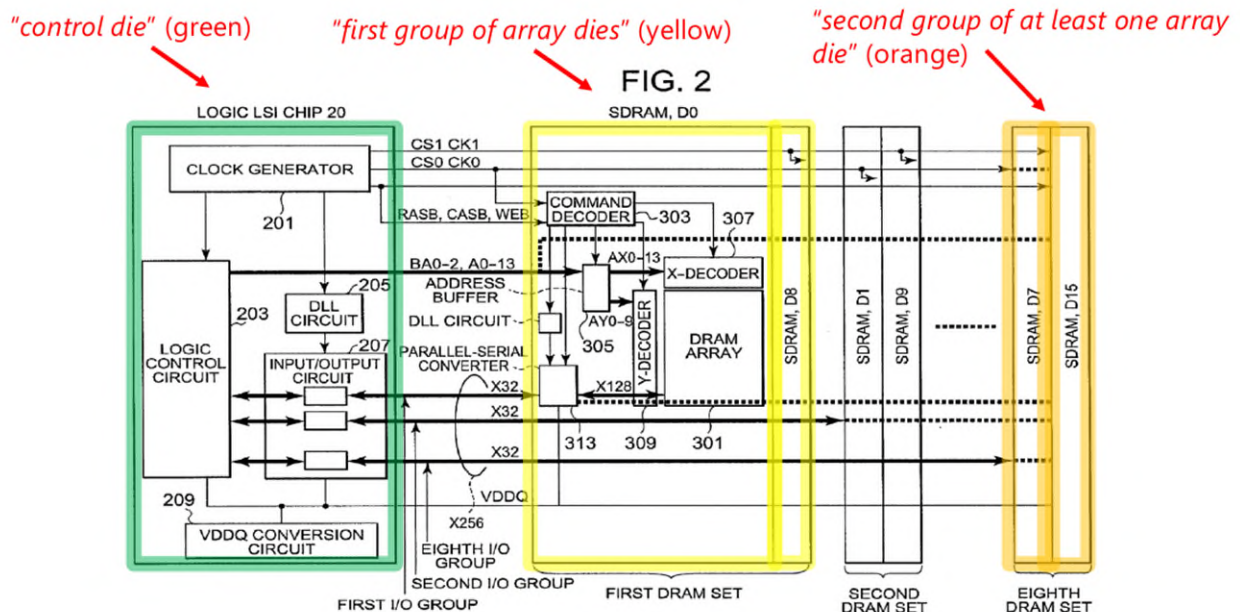
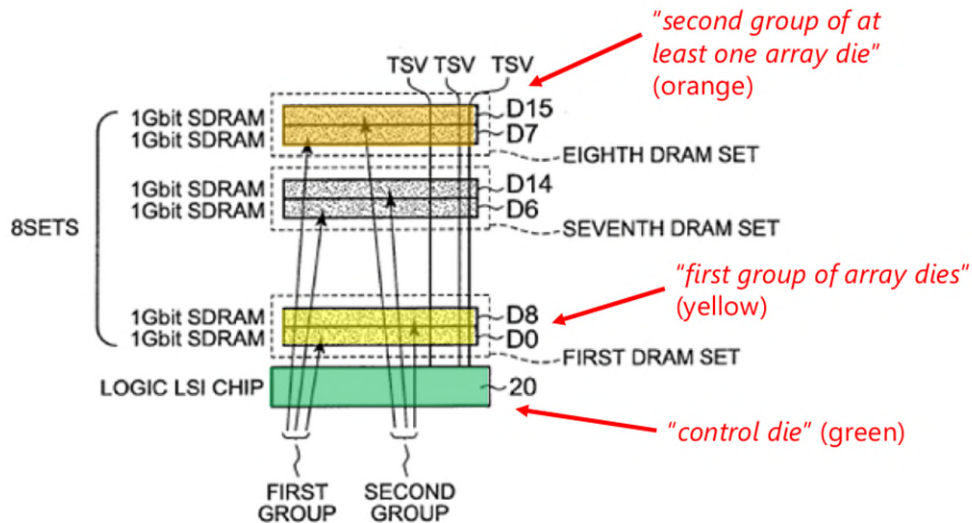
c) [1.c] Stacked Array Dies

Ground 2 teaches “*stacked array dies* [e.g., SDRAM chips D0-D15, each chip including a respective DRAM array 301] *including a first group of array dies* [e.g., a first DRAM set including the pair of SDRAMs D0 and D8 sharing data signal DQ TSV08 (yellow)] *and a second group of at least one array die* [e.g., an eighth DRAM set including the pair of SDRAMs D7 and D15 sharing data signal DQ TSV715 (orange)].” EX1016, ¶¶[0027, 0029, 0045-47, 0049, 0062], Figs.1-2

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(below); EX1003, ¶¶538-545. A POSITA would understand that Riho's SDRAM chip includes a "die." EX1018, Abstract, Fig.1 ("stacked" "chip die[s]"); EX1003, ¶542.

FIG. 1



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shown above, the merits of this petition are compelling. Thus the *Fintiv* factors favor institution. EX1047, pp.3, 8-9; EX1048, p.35; *Samsung Elecs. Co. v. Staton Techiya, LLC*, IPR2022-00324, Paper 13, at 12 (PTAB July 11, 2022) (“24.2 months”); *Siemens Indus. Inc. v. EMA Electromechanics, Inc.*, IPR2021-01517, Paper 9, at 11-12 (PTAB Mar. 15, 2022) (factor 2 neutral when FWD deadline less than one month after potential trial date).

X. CONCLUSION

Petitioner therefore respectfully requests that Trial be instituted and that claims 1-20 be canceled as unpatentable.

Dated: August 26, 2022

/Eliot D. Williams/
Eliot D. Williams
Reg. No. 50,822
BAKER BOTTS L.L.P.
30 Rockefeller Plaza
New York, NY 10112
T: (212) 601-7255
F: (212) 408-2501

Theodore W. Chandler
Reg. No. 50,319
BAKER BOTTS L.L.P.
1801 Century Park East
Suite 2400
Los Angeles, CA 90067
T: (213) 202-5702
F: (213) 202-5732

Ferenc Pazmandi
Reg. No. 66,216
BAKER BOTTS L.L.P.

Petition for *Inter Partes* Review of U.S. Patent No. 9,318,160

101 California Street
Suite 3200
San Francisco, CA 94111
T: (415) 291-6255
F: (415) 291-6355

Michael E. Knierim
Reg. No. 78,268
BAKER BOTTS L.L.P.
30 Rockefeller Plaza
New York, NY 10112
T: (212) 408-2584
F: (212) 259-2584

Brianna L. Potter
Reg. No. 76,748
BAKER BOTTS L.L.P.
1001 Page Mill Road
Building One, Suite 200
Palo Alto, CA 94304
T: (650) 739-7556
F: (650) 739-7656

Counsel for Petitioner
Samsung Electronics Co., Ltd.

Petition for *Inter Partes* Review of U.S. Patent No. 9,318,160

CERTIFICATE OF COMPLIANCE

I hereby certify that this petition complies with the type-volume limitations of 37 C.F.R. § 42.24 because it contains 13,404 words (as determined by the Microsoft Word word-processing system used to prepare the petition), excluding the parts of the petition exempted by 37 C.F.R. § 42.24.

Dated: August 26, 2022

/Eliot D. Williams/

Eliot D. Williams

Reg. No. 50,822

BAKER BOTTS L.L.P.

30 Rockefeller Plaza

New York, NY 10112

T: (212) 601-7255

F: (212) 408-2501

Counsel for Petitioner

Samsung Electronics Co., Ltd.

Petition for *Inter Partes* Review of U.S. Patent No. 9,318,160

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of August, 2022, a copy of this Petition, including all exhibits, has been served in its entirety by FedEx Express on the following counsel of record for Patent Owner:

Jamie J. Zheng, Ph.D., Esq.
USCH Law, PC
3790 El Camino Real #1147
Palo Alto, CA 94306-3314

Dated: August 26, 2022

/Eliot D. Williams/
Eliot D. Williams
Reg. No. 50,822
BAKER BOTTS L.L.P.
30 Rockefeller Plaza
New York, NY 10112
T: (212) 601-7255
F: (212) 408-2501

Counsel for Petitioner
Samsung Electronics Co., Ltd.